

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER,)	
)	
Plaintiff,)	C.A. No. 04-970(JJF)
)	
v.)	
)	
CITISTEEL USA, INC.)	
)	
)	
Defendant.)	

**PLAINTIFF'S RESPONSES TO DEFENDANT'S
SECOND REQUEST FOR PRODUCTION**

16. All pamphlets, notices, notes and other documents relating to the employee benefits package at the Skelly Group, as requested during Plaintiff's deposition.

RESPONSE: Plaintiff is not in possession of this information, nor has she been in the past, either prior to, during or after her depositions.

17. Any and all correspondence, agreements, and other documents referring or relating to your retention and dismissal of Thomas Neuberger, Esquire and his associates, as requested during Plaintiff's deposition.

RESPONSE: Plaintiff's counsel objects to this request as the information requested is protected under the attorney/client privilege and attorney work product. Without waiving this objection, Plaintiff is not in possession of any of these documents as they have been discarded.

18. All resumes and cover letters you provided to potential employers after your employment with Defendant, indicating for each the (a) date the document was created; and (b) date(s) the document was provided to potential employers.

RESPONSE: Every cover letter in which Plaintiff was in possession has been produced.

19. All documents received from potential employers or employment agency during or after your employment with Defendant, including without limitation documents relating to interviews, job offers, job information, job rejection notices, “turn down letters”, or further inquiry following your submission of a job application or resume, received from a prospective employer, employment agency, employment search firm, recruiter, temporary staffing firm.

RESPONSE: To the extent these documents exist and were in the control and/or possession of Plaintiff, they have been produced.

20. All documents that indicate the availability of a Clerk/Typist or comparable position in the Shipping Department in April 2003.

RESPONSE: Plaintiff is not now and has never been in possession of documents that would indicate the availability of a Clerk/Typist or comparable position in the Shipping Department in April 2003.

21. All documents identified or referred to, in your answers to Defendant’s Second Set of Interrogatories Directed to Plaintiff.

RESPONSE: To the extent these documents exist and were in the control and/or possession of Plaintiff, they have been produced.

22. All documents identified or referred to, in your answers to Defendant’s First Request For Admissions Directed to Plaintiff.

RESPONSE: To the extent these documents exist and were in the control and/or possession of Plaintiff, they have been produced.

23. Any other document or thing in your possession or available to you, in addition to the items specified in previous sections of this Request for Production that is relevant to any issue in the litigation, including but not limited to issues of liability and/or damages and which has not been previously produced.

RESPONSE: To the extent these documents exist and were in the control and/or possession of Plaintiff, they have been produced.

MARGOLIS EDELSTEIN

Dated: September 15, 2006

/s/ Lori A. Brewington
Jeffrey K. Martin, Esquire (#2407)
Lori A. Brewington, Esquire (#4522)
1509 Gilpin Avenue
Wilmington, Delaware 19806
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Attorneys for Plaintiffs

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CITISTEEL USA, INC.)	
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CERTIFICATE OF SERVICE

I, Lori A. Brewington, do hereby certify that on September 15, 2006, I electronically filed *Plaintiff's Response to Defendant's Second Request For Production* with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Margaret M. DiBianca, Esquire
Sheldon N. Sandler, Esquire
Young Conaway Stargatt & Taylor LLP
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899-0391

MARGOLIS EDELSTEIN

Dated: September 15, 2006

/s/ Lori A. Brewington
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